

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Inquiry Regarding Carrier Current Systems)	ET Docket No. 03-104
Including Broadband over Power Line)	
Systems)	
)	

REPLY TO COMMENTS OF THE UPLC FILED JULY 7, 2003

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August 20, 2003

Response:

The United Power Line Council, in its above-referenced filing, addresses the likelihood of interference from BPL and makes the statement that “The UPLC is pleased to respond that there has been no interference reported in any of the field trials by its members.”

This is not a valid position to be arguing from. Whether its members report interference or not has no bearing on whether interference will take place.

The Commission has for decades established not only that licensed services must not interfere with one another, but that incidental radiators such as BPL should not interfere with licensed services, and there are an assortment of measurements of incident level by which this can be measured. Whether the members of a private group think this is important can hardly be of decisional significance.

The UPLC states further that “The experience gained from this process indicates that BPL systems comply with the Part 15 limits, and that the existing rules protect licensed users against interference from BPL systems”. Nowhere in this paper can I find that there is evidence of existing users being protected.

What there is the representation that a signal strength of 30 microvolts per meter is the limit the UPLC is working with, and believes this will protect existing users.

It is well known to the Commission’s technical staff that this is a very strong signal – and were this on the standard broadcast band, it would be on the signal level of a strong local radio station. Which as we all know overrides just about anything else at that spot on the dial, which for a broadcast station it is designed to do.

The phenomenon is hardly changed because we are not talking about the standard broadcast band but the 1.7 – 30 MHz portion of the spectrum. In this case the BPL noise would clearly override almost all signals that a radio, connected to the type of antenna commonly used on these frequencies, would otherwise receive.

It would also be true that the BPL noise at numerous random points would be additive at a specific receive point. At these frequencies, signals of this level can travel hundreds of miles. Radio amateurs regularly communicate for a thousand miles with half watt transmitters. So that while a single power line can be measured at 30 meters and may be in compliance, at that same receive point there could well be an equal signal from other power lines all over the region.

If we allow a system that radiates wideband noise that is readily receivable by a commonly used radio receiver tuned to these frequencies, it will make reception of the relatively weak signals commonly used for communications on these frequencies impossible..

It will deprive licensed users of their ability to use their communications systems, and that is what the Commission is supposed to protect.

Amateur radio operators, emergency preparedness services such as the Red Cross, aircraft weather, navigation, scientific measurements, short wave broadcasts, and more would all be obliterated if a radio can’t be used for weak signals within a few hundred feet of power lines.

Respectfully submitted,

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